

Comment Letter R-I25

From: Tony Kurlovich <kkurly@att.net>
Sent: Saturday, August 04, 2018 1:24 PM
To: LUEG, PalomarMP; michael.schumacher@carlsbadca.gov
Cc: Nancy Sayles Kurlovich
Subject: Fw: Low flying over residential area

This is a serious safety issue. This was the first I was able to report. Earlier, there was a private aircraft that buzzed the RC golf course at less than an estimated 300 ft above grade but I was in shock did not in a position to deal with it.

I have yet to get any response from the FAA. This compounds my concern.

This lack of response constitutes permission for unsafe flying. In the event of a crash due to negligence, Palomar could be seen culpable and may not be able to hide behind the FAA. This would open up the county and city to liability and the wrath of voters.

On Tuesday, June 20, 2017 3:05 PM, Tony Kurlovich <kkurly@att.net> wrote:

To
jacques.beaver@faa.gov
CC
Andrew.little@faa.gov

Time: Monday 6/12/17 at about 12:28 PM
Place: 3534 Don Carlos Dr., Carlsbad, Ca 92010

After hearing it, I saw a single engine plane approaching from the NNW at a very low altitude. It made a very hard bank near Cannon Rd. and returned in roughly the direction from which it came. My estimate of the altitude was significantly less than 800 ft. More worrying was the steep bank angle. Additionally, the direction of its approach would have taken it over hilltop residences that 200 to 300 feet higher than where I saw it.

I called Jessica at Palomar operations (760-966-3273) and after her review of the tracking data she confirmed the initial observations. She identified the tail number as N6870L registered to Barr Air Patrol.

My concern is the Low altitude flight over residences and near schools, combined with the high bank angle, leaves little room for mechanical failure or additional pilot misjudgement.

Tony Kurlovich 858-229-7192

R-I25-1

R-I25-2

Response to Letter R-I25**Tony Kurlovich**

- R-I25-1** This comment states the commenter's safety concerns with low flying aircraft at the Airport. The County acknowledges receipt of this comment; however, it does not cite specific environmental issues with the PEIR analysis or proposed mitigation. Please refer to **Master Response 6** discussing existing Airport activity. Furthermore, the comment does not provide input related to the recirculated Draft PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs). Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I25-2** This comment includes a copy of an email sent from the commenter to FAA concerning low flying aircraft at the Airport. Please refer to **Response to Comment R-I25-1** above. No changes to the PEIR have been made, and no further response is required.

Comment Letter R-I26

From: Robt Carter <bobcarter43@yahoo.com>
Sent: Sunday, August 05, 2018 10:43 PM
To: council@carlsbadca.gov; scott.chadwick@carlsbadca.gov; LUEG, PalomarMP; Robt Carter
Cc: bobcarter43@yahoo.com
Subject: Re: CRQ Airport Meeting on June 19

Hi, I have a couple of new points regarding the proposed expansion of the Palomar airport.

1. The owner and promoter of Cal Pacific Airlines has said in press releases that several new business' moved into North County as a result of his proposed airline operation at Palomar. The new FedEx distribution center in Oceanside was specifically given as an example. As a retired FedEx employee that is familiar with their operations I can say this is not true. The FedEx distribution center in Oceanside is a FedEx Ground facility, not an air facility. As such, its cargo moves on the ground in trucks. The CPA contention is false.

R-I26-1

FedEx does have an air express facility in Carlsbad. This facility trucks air express packages to the San Diego airport in large cargo containers that fit on large FedEx cargo planes. Inbound packages arrive in Carlsbad via large air cargo containers via the San Diego airport as well. The airline cargo containers require large body aircraft, not regional jets that have to be hand loaded.

I am not a spokesman for FedEx but I can say that your being mislead about FedEx's motives in moving to Oceanside.

The second point I would like to make is the fact that 5 people were killed at the Santa Ana Airport this afternoon while on an approach to land. This tragic accident is what happens when you have an airport in your city. This might be a good time to see how many accidents have taken place at Orange County to get a feel on what could happen with larger operations at CRQ. God forbid an aircraft crashes at LegoLand or the Factory Outlets which are in the departure flight path of CRQ.

R-I26-2

Thanks for listening.

Regards, Bob Carter

On Friday, June 29, 2018, 9:49:51 AM PDT, Robt Carter <bobcarter43@yahoo.com> wrote:

On Wednesday, June 27, 2018, 10:38:38 PM PDT, Robt Carter <bobcarter43@yahoo.com> wrote:

Hi, my name is Bob Carter and I have a few concerns about the proposed CRQ master plan. I am not an expert in environmental issues but did live next to (three blocks away) the LA airport for 20 years so have some first hand experience with noise pollution, air pollution and traffic congestion around airports. I am a licensed pilot and have also spent over 40 years working in the airline industry.

R-I26-3

During the questions and answer session, Mr. Paul Hook said that his company's (Cal Pacific Airlines) aircraft omit "zero smoke" and "zero emissions". He said that the planned aircraft , the Embraer 170 and 145 fell into this category. Being somewhat skeptical I looked up the engines specifications for the Embraer 170 and it does emit both smoke and emissions. The GE engine most Embraer 170's use is the GE CF34-8-E. While this engine meets ICAO CAEP stage 6 emission standards and ICAO chop 4 noise standards, that does not mean that their are "no emissions and zero smoke". I used the original Cal Pacific Airlines aircraft number N760CP for my research. It does not make sense that large jet engines emit no smoke, or emissions nor noise. There is obviously combustion and thus exhaust and noise. Mr. Hook's comment is obviously a inaccurate.

Given that noise and air pollution were two top issues during the meeting I think the record should show the actual incremental smoke and emissions which can be found on line via GOOGLE search by engine type (see above). In addition, one must wonder how an accurate an upfront Environmental Impact Report (EIR) is if aircraft types, flight schedules, number of aircraft are not known. When I asked the panel during the Q @ A, they agreed that this is indeed a problem.

During the meeting, the presenters (Kaplan, Kirsch, Rockwell) showed a number of examples where they claimed that citizens and airport authorities found mutually acceptable solutions to noise and emission problems. One of the examples of such a "success" was the move from the old Denver Stapleton Airport to the new DIA airport, which is approximately 17 miles due East or 19 minutes of driving with no traffic and 45 minutes with heavy rush hour traffic. What was **not mentioned** was the **prime reason** for the move and that was the fact that the Stapleton runways were too close together to operate parallel simultaneous take off and or ILS landings because the runways were too close together. During bad weather, this limitation caused significant flight delays with aircraft circling for extended periods of time waiting for their time to make the final ILS approach to only one active runway. . This was the primary reason for the new airport construction, not noise or air pollution. Stapleton did not have enough land to expand the runways to meet safety requirements. I say this was a misleading example of stake holders finding a mutually acceptable solution.

Mr. Kirsch also did not mention the fact that the Santa Monica Airport has plans to close as a result of citizens concerns over safety, noise pollution, and air quality. He also did not mention that LAX has had to buy out at great expense hundreds of homes around the airport property because of noise, pollution and safety concerns. Also not mentioned were the constant complaints of citizens of Newport Beach over noise at the John Wayne airport. Not mentioned were actual air crashes at LAX and night time operational constraints (landing from the west). In addition, many regional airports have closed in the past two years as airlines have pulled out of them due to a lack of traffic volume.

It was also stated that moving from a "D2 Airport" classification to a "D3 airport" represent "no new uses to the current airport plan". This is a stretch given the fact that the CUP defined CRQ as a "General Aviation Airport" which traditionally meant small private aircraft. The Embraer 170's are not small private aircraft. In fact, the current runway needs an extension for safe operations with a full load of 70 passengers. This is a "New Use" and is a violation of the original CUP terms. This reclassification is a major change to the agreed to historic use of the airport. The historic context of CRQ was that is was to remain a small "General Aviation Airport". The proposed 500 ft eastern extension is being sold as a "safety" issue. Ironically, this proposed 500 feet extension is just enough additional runway for an Embraer 170 to get off the ground with 70 passengers - a full load. This appears to be an expensive move to allow a specific airline to operate their older and larger 70 passenger jets. If an airline airlines was to buy newer more expensive jet aircraft with more power, this extension would not be necessary.

In closing, I want to say that I just returned from a 5 day trip out of the San Diego airport. When I got into my car that was parked at an airport parking lot, I turned on my windshield wipers, sprayed them with the soap, and looked at the black grim that was produced on either side of the windshield. This black dust was all over my car. Yes, this is the impact of having high performance jet operations. While much cleaner than older jet engines, air pollution is still an unfortunate reality. Do the citizens of Carlsbad really want this dirty gritty air covering their city? I suspect the answer is no. I say, let them vote on it.

The question I ask is what is the compelling need to expand airline operations at CRQ when we already have a fine airport less than 45 minutes away that serves hundreds of destinations. This is like Torrance wanting their own airport to compete with LAX. For those saying that they will save time commuting to the San Diego Airport, that is not really true as CRQ will only serve 4 original destinations and we know that those four destinations will not meet the needs of the general flying public. Lindbergh Field will still be used for the majority of the traveling public. Cal Jet Elite trimmed their flights from two a day to 9 weekly flights prior to stopping operations.

Here are several suggestions: 1. Offer the citizens a "No airport Expansion" vote in a special election. 2. Since the Coaster already operates from Carlsbad to the San Diego Santa Fe station with every 15 minute bus connections to the San Diego airport, promote its usage. 3. Promote UBER which charges only \$45.00 one way to Lindbergh Field. It is door to door, operates 24 hours a day, and eliminates the daily parking fees.

The prime promoter, County Supervisor Bill Horn is termed out later this year. Promote a vote for a new Supervisor that lives in Carlsbad that is against this unnecessary and costly airport expansion. Carlsbad leadership has to decide if it wants to be sensitive to its citizens needs for a quiet high quality bedroom community or cater to a small group of business interests that want expansion, congestion, noise pollution, and air pollution all in the name of progress.

Thanks for listening,

Robert Carter
bobcarter43@yahoo.com

R-I26-3
cont.

Response to Letter R-I26**Bob Carter**

- R-I26-1** This comment includes remarks and clarifications regarding FedEx cargo ground operations in its relation to northern San Diego County. The County acknowledges receipt of this comment; however, it does not cite specific environmental issues with the PEIR analysis or proposed mitigation. No changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I26-2** The comment recommends for the County to study aircraft accidents in Orange County to anticipate potential aircraft accidents that could happen at McClellan-Palomar Airport. Please refer to **Master Responses 6 and 7** for a discussion of existing Airport activity and FAA's oversight of aircraft, respectively. Furthermore, the comment does not provide input related to the recirculated Draft PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs). Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I26-3** This comment consists of a duplication of the commenter's original email sent on June 29, 2018. Please refer to **Response to Comment R-I8**. No further response is required.

Comment Letter R-I27

From: Graham Thorley <graham.thorley@sbcglobal.net>
Sent: Sunday, August 05, 2018 3:19 PM
To: LUEG, PalomarMP
Subject: Recirculated Draft CRQ MP PEIR Questions and Comments
Attachments: 2018 CRQ Recirculated Master Plan Questions.pdf

Ms. Curtis,

Please find enclosed my comments and question on the next 20 Year Palomar Master Plan.

I look forward to the County's response in addressing my comments and questions in an expected new RE-RE-circulated document addressing the identified omissions.

R-I27-1

Graham R. Thorley

Graham R. Thorley • SaveCarlsbad.com • graham.thorley@savecarlsbad.com

Email: PalomarMP@sdcounty.ca.gov

Date August 5, 2018

Mail: County of San Diego, Department of Public Works

E-MAIL: PalomarMP@sdcounty.ca.gov

Attn: Cynthia Curtis

5510 Overland Avenue, Suite 410

San Diego, CA 92123

First I must state with the overwhelming number of public comments and questions on the original PEIR, I am surprised the recirculated Draft PEIR is lacking in so many topics needing better definition. Additionally, given your direction from Supervisor Bill Horn, in the Board of Supervisors Meeting on December 16, 2015, I do not understand why this Plan has NOT followed Supervisor Horn's directions, to paraphrase, *"I think this is a huge commercial driver here and we are planning an airport for 50 if not the next 100 year" vision*. As such, this Plan is void of that vision. Or, has that vision been skillfully hidden in its wording from the public?

That said, this recirculated document is still void of addressing environmental issues commented on in my original PEIR documentation. I am aware it is the intent of the County to address already documented questions in the final document package presented to, I assume, at the time of Board of Supervisor vote on the airport expansion. However, I would have thought the public would have the chance to comment, scientifically disagreeing or ask for more detailed information if the County's answer is lacking in detail. For example, in my original submitted PEIR comments and questions document, there are a number of comments and questions asking for more detailed information on today's lead contamination both in the ground and airport's air quality. This begs the question, WHY is there no additional information in the recirculated PEIR regarding McClellan-Palomar's lead contamination and failures to meet federal requirements in the past or how the expanded airport will meet these requirements going forward.

After five (5) years or more studying this known issue, the County should have documentation on exactly how it plans to solve the issue of today and in the future. To say in AB 32, the State does not have regulatory authority over aviation, is frankly not relevant. Talk about skirting the County's responsibility to protect the health of its citizens. Then, there is the ground water contamination issue that has not been addressed.

The County is the property manager of the airport and as such, contamination on or in the ground is not an aviation issue - it is a land management issue. As such, please provide detailed lead and ground water contamination maps and other documents from City, County, State and Federal agencies required to comply with land management contamination. FYI - In meeting with experts, they have no idea how the full Master Plan can be accomplished without contaminating the aquifer.

This documentation needs to include not only the airport property, but all the leaching of airport ground contamination into the soil and water of the airport's surrounding communities land. Only then can the public properly review and comment on this recirculated DRAFT PEIR.

R-I27-2

It has been reported, according to the 2014 (2017 report is not yet available) National Emissions Inventory (NEI) report:

1. McClellan-Palomar Airport is in the top 30 out of 20,000 lead producing airports in the country.
2. It only takes about 5 micro grams of lead per deciliter in the blood to be really bad for children health.

R-I27-3

With the proceeding facts, please explain why the County is not revealing the fact that CRQ is the only airport out of 17 airports tested that still refused to correct the issue found in the EPA 2011 lead air contamination testing.

Additionally, WHY are these facts not mentioned in the recirculated DRAFT PEIR for the public education. All that seems to be listed is hollow words stating the project will comply with all required regulations. These word sound good in a report, but are far from the truth when compared to actual facts.

With the above, I think the kindest comment I can say is this Plan's document may meet the spirit of the California Environmental Quality Act's (CEQA) legal requirements, but falls seriously short in being truthful with the uneducated "airport and aircraft industry" public. The plan is full of verbiage throughout, like "This was not required at the time, not needed or statement to paraphrase we will figure it out later," etc., etc., etc.

I am sure it checks a lot of the boxes, but it is less than adequate for public consumption.

That said, "it" may have not been required at the time, but before this plan is approved "it" most certainly now needs to be included for Public review. Therefore, another recirculated PEIR needs to be published and submitted to the public for review.

Nothing points this out more than Page 1 of the Reader Guidelines:

R-I27-4

"Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce impacts to a level of insignificance.
- 3) A feasible project alternative or mitigation measures considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines, Section 15088.5(a)."

I completely agree with all the above CEQA Guidelines and this plan is, as #4 states *"... so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."*

Bottom line, after eight (8) or more years of County planning to expand CRQ, I cannot believe the County needed the public to identify these obvious missing sections.

Frankly, if the Plan's reasons to expand are to be believed and so much missing, it needs to be recalled and be rewritten to address the facts being hidden from the public and the "Paradigm Shift in regional air transportation" already is about to making the County's next 20 year future plans obsolete.

R-I27-4
cont.

Then there is the fact (NOT mentioned in any part of this recirculated plan nor the original PEIR) is a comprehensive financial analysis of the justification for expanding an airport that has lost millions of dollars since 2011 and continues to contribute to GHG and Noise Pollution of its surrounding communities. NOR is there any mention of County's fiduciary responsibility to protect its citizens' health and property values? Please explain why this is not addressed and when this will be included in the recirculated PEIR for another 45 day public review.

R-I27-5

GHG Pollution has now been shown to:

1. Increase the "Health Care Cost" of the citizens
2. Decrease the Quality of Life of the citizens
3. Contribute to the "Global Warming" that is now raising the ocean water temperatures resulting in the expansion of the oceans and melting of the "Ice Caps". Both have now been shown to be the cause of increasing the sea level. This increased of sea level is projected to cost BILLIONS of Dollars to protect our coastline. Fact and now starting to be seriously planned for - according to TV documentary on Aerial America in 2016 (On the Water) episode, "*San Diego's entire infrastructure is at risk*" from rising sea levels.

As I commented in my March 18, 2018 original released PEIR cover letter, this whole Plan is and now continues to be nothing more than a "Bait and Switch" effort to benefit a few. It is not an effort to benefit the majority of the ONE MILLION North County residents who are already suffering from the above results the airport has created in the past and this plan will continue to negatively and greatly contribute to the GHG impact and Global warming.

R-I27-6

Fact:

- Ocean water temperature 78.2 degrees (F) recorded by Scripps Institute of Oceanography at Scripps Pier. That is the highest temperature recorded in 102 years. <http://www.sandiegouniontribune.com/news/science/sd-me-scripps-pier-20180802-story.html> See #3 above for predicted consequences for San Diego.
- Fire Season historically started in mid-October, now it is starting in May or June
- Today is the beginning of August and there are 19 major fires in CA that have already burned 300,000 acres and destroyed more than 1,000 homes and now more than 32,000 persons displaced - <https://www.youtube.com/watch?v=mpFRBLnmSRA>
- Per the American Lung Association, San Diego County - Carlsbad is #6 on its most 228 worst polluted communities. In 2015, it was 35th!

Additionally, this Plan purports there are no taxpayer dollars involved or required for the airport expansion. Let's see if I understand that questionably correct, but shortsighted statement.

R-I27-7

TONS more GHG pollution will be created by larger and larger aircraft. Therefore, the following taxpayer dollars will be spent to correct the ongoing GHG pollution buildup because of political shortsightedness.

Billions of taxpayer dollars needing to be spent to:
<ul style="list-style-type: none"> • Prevent San Diego infrastructure from going under water • Treating all the now recognized health effects of more GHG • Soundproof homes and schools • Correct traffic problems not included in the Plan
Thank you, San Diego County politicians, for irresponsible actions not curtailing GHG pollution because of loopholes in the law.

R-I27-7
cont.

Additionally, the Plan presents no convincing facts on why or if the airport needs to expand. In fact, it describes the exact opposite!

Again, after eight (8) years or more of working on this plan and untold amount of dollars spent, I am embarrassed our County officials feel this Plan is ready for the light of day. It is NOT! It is only trying to cover-up the County's attempt *"to put lipstick on this pig."*

While San Diego County was preparing its flawed highly polluting and costly CRQ Expansion Plan, the rest of the of the Country and World have realized, "Regional Airports" are too disruptive to the community and one of the most polluting environments to be a viable solution going forward!

~ OR, as Benjamin Franklin is famous for saying, *"Half the truth is often a great lie."* ~

Looking forward to either a RE-REcirculated PEIR or the completely truthful and factual rewrite of the new 20 Year McClellan-Palomar Airport Master Plan. This Plan is soooooo shortsighted in the reality of today's changing climate and environmental facts - <https://www.youtube.com/watch?v=m-FM845gial>

R-I27-8

The video link above is not intended to start another useless debate about if global warming is happening, but to emphasize your political responsibility in light of scientific factual studies and conclusions now coming to the forefront and can no longer be denied. These studies are now disproving the "Chamber of Commerce" and "Business Roundtable" propaganda.

Further proof the scientific studies are correct, if they were not why would the State, County and Cities along the waterfront, now intensely be embroiled in solutions to protect the cost from near future catastrophic flooding as the ocean temperature increases and the ocean expands and the ice shelves of Greenland and Antarctica continue to melt at an ever increasing alarming rate.

It is time to do the right thing — take a stand and protect your integrity, STOP the expansion of McClellan-Palomar Airport and save your children's and grandchildren's health and future.

Thank you,
Graham R. Thorley

CC San Diego Board of Supervisors • Carlsbad City Council • Jason Haber

Graham R. Thorley • SaveCarlsbad.com

[Master Plan and PEIR Questions and Comments](#)

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Recirculated Draft PEIR Questions and Comments

McClellan-Palomar DRAFT Program Environmental Impact Report - PEIR

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R-I27-9

Item #	Document Page # & Section #	Section 2.2 Biological Resources	
1	Page 2-19	<p>Migratory Bird Treaty Act:</p> <p><i>"... The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, the MBTA is now used to place restrictions on disturbance of active bird nests during the nesting season (generally February 15 to September 15). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests."</i></p> <p>Also, per CRQ's website instruction to pilots states: <u>Extensive bird activity in vicinity especially in the spring.</u></p> <p>Most of the verbiage reciting local, state, and federal regulation is nice, but <u>there is no information on the impact by the migrating birds on safety to the community when an aircraft hits one of these birds.</u></p> <p>Please provide a complete description of migrating bird and acreage and potential safety impact to the airport's surrounding communities.</p>	R-I27-10
2	Page 2-27	<p>Noise Section:</p> <p>It is interesting there is no reference to Aircraft Noise impact on the public. Given the overwhelming worldwide health studies now available and the fact the European Aviation Safety Agency (EASA) has regulated a 55 dB limit requirement for all aircraft using EASA airports because of the well respected health studies.</p> <p>PLEASE EXPLAIN why this Master Plan is void of any information or concerns for Carlsbad and its surrounding citizens future health issues caused by an expanding commercial airport's aircraft noise.</p>	R-I27-11
3	Page 2-40	<p>2.2.6 Conclusion:</p> <p><i>"Implementation of the Proposed Project would have the potential to result in impacts to Special Status Species, Riparian Habitat or Sensitive Natural Communities, Jurisdictional Wetlands, and Local Policies, Ordinances, and Adopted Plans. However, consultation and permitting with applicable regulatory agencies, including implementation of mitigation measures M-BI-1a through M-BI-6 would reduce all impacts to biological resources to a level less than significant."</i></p> <p>Please explain with the release of the McClellan-Palomar Airport Runway Feasibility Study in August 2013 and after working on this airport expansion plan since that publication, which of these agencies have been contacted?</p> <p>If they have not been contacted, please explain how the public can be expected to evaluate this Draft PEIR along with no information or any proposed budget for the preferred plan solution.</p> <p><u>Without such facts, this Recirculated Plan needs to be RE-REcirculated</u></p>	R-I27-12

		<u>with facts the public can properly evaluate.</u>
4		<p>Neither this section nor Appendix A addresses the fact there is no information regarding the venting of unburned Methane Gas.</p> <p>The airport is continually being unresponsive to its requirements to protect the environment on the land it is tasked to protect, e.g., FROM CalRecycle Inspection Report "<u>Palomar Airport pictures February 2018 - LEA Periodic 2/26/2018 North Coastal SLF (Palomar Airport) 37-AH-0002</u>" Inspection of Palomar Landfill Unit 1 by San Diego County LEA "...but the water is traveling towards the east and is ponding over a portion of the landfill, and there are cracks in the asphalt over the landfill which the water can seep into. Ponding (standing) water over the landfill is not allowed (Title 27 Section 20650) and is supposed to be removed by airport staff within 24 hours(after a rain event).</p> <p><i>Also violation where "Landfill gas (methane) exceeding the regulatory standard has been an ongoing violation in one area on the north side of the landfill." (methane leak violations have occurred through 6/2018 so far)."</i></p> <p>In researching the issues with the landfill and water contamination on the airport, including the reported fires, toxic contaminated liquid leaking into ground water under the airport AND ground water off of the airport property, this Biological Section is greatly void of ALL that information.</p> <p>Therefore, this entire section needs to be RECIRCULATED. In that recirculated document, PLEASE PROVIDE the historical violation documentations from ALL responsible agencies of the present and past condition found on and off the airport regarding the ground water so the public can properly evaluate how this airport is contaminating the surrounding community's water table and air quality.</p> <p>Additionally, PLEASE EXPLAIN, in a RE-REcirculated PEIR as land managers, how the County intends to comply with all land management regulations in the future, as is now evident it has not done in the past.</p> <p>Furthermore, PLEASE PROVIDE the information of present tonnage of the unburned venting Methane Gas along with how many underground fires have been recorded since 1990.</p> <p>Lastly, PLEASE PROVIDE how these fires will be prevented in the future by this Plan.</p> <p>I look forward to the RE-REcirculated PEIR.</p>

↑ R-I27-12
cont.

R-I27-13

Item #	Document Page # & Section #	<h2 style="text-align: center;">Supplement to Draft PEIR Appendix B</h2>
1	Page 7 of 12	<p>"Issue 3: Jurisdictional Waters and Wetlands</p> <p>Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?</p> <p>Issue 3 Impact Analysis</p> <p>No federally protected wetlands occur within the Eastern Parcel and the project would not impact federally protected wetlands.</p> <p>Issue 3 Mitigation Measures</p> <p>None required."</p> <p>The above is only one example of the County claiming it is not required to meet this or that because there is no law or regulation agency responsible. A good excuse, but not correct and therefore NOT an acceptable answer for this section or the communities around the airport.</p> <p>The airport is continually being unresponsive to its requirements to protect the environment on the land it is tasked to protect, e.g., FROM CalRecycle Inspection Report "<u>Palomar Airport pictures February 2018 - LEA Periodic 2/26/2018 North Coastal SLF (Palomar Airport) 37-AH-0002</u>"</p> <p>Inspection of Palomar Landfill Unit 1 by San Diego County LEA "...but the water is traveling towards the east and is ponding over a portion of the landfill, and there are cracks in the asphalt over the landfill which the water can seep into. Ponding (standing) water over the landfill is not allowed (Title 27 Section 20650) and is supposed to be removed by airport staff within 24 hours(after a rain event).</p> <p>Also violation where "Landfill gas (methane) exceeding the regulatory standard has been an ongoing violation in one area on the north side of the landfill." (methane leak violations have occurred through 6/2018 so far)."</p> <p>In researching the issues with the landfill and water contamination on the airport, including the reported fires, toxic contaminated liquid leaking into ground water under the airport AND ground water off of the airport property, this Biological Section is greatly void of ALL that information.</p> <p>Therefore, this entire section needs to be RECIRCULATED. In that recirculated document, PLEASE PROVIDE the historical violation documentations from ALL responsible agencies of the present and past condition found on and off the airport regarding the ground water so the</p>

R-I27-14

		<p>public can properly evaluate how this airport is contaminating the surrounding community's water table and air quality.</p> <p>Additionally, PLEASE EXPLAIN, in a RE-REcirculated PEIR as land managers, how the County intends to comply with all land management regulations in the future, as is now evident it has not done in the past.</p>	R-I27-14 cont.
2	General Biological Question	<p>Neither this section nor Section 2.2 addresses the fact there is no information regarding the venting of unburned Methane Gas.</p> <p>PLEASE PROVIDE the information of present tonnage of the unburned venting Methane Gas along with how many underground fires have been recorded since 1990. Additionally, PLEASE PROVIDE how these fires will be prevented in the future airport described by this Plan,</p>	R-I27-15

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		<p>management of aircraft on the ground."</p> <p>Additionally, <i>"Furthermore, while the County's General Plan identifies the Airport as a County-owned facility, the Airport is located within the municipal boundary of the City of Carlsbad, and does not have a County-designated General Plan land use designation to compare against the CAP Checklist. Accordingly, because the County does not have the regulatory ability or authority to control or restrict aircraft movement or their associated GHG emissions, the County's CAP does not include aircraft emissions in its emissions inventory. Because the Airport is not subject to a County General Plan land use designation (the Airport is located within the municipal boundaries of the City of Carlsbad), aviation-related GHG emissions were not included in the County's CAP emissions inventory, and the Master Plan improvements were not included in the 2011 County General Plan on which the CAP was based, a consistency checklist review would not demonstrate CAP coverage. However, because aircraft emissions and Master plan improvements were not included in emissions reductions in the CAP, the project does not impede or interfere with meeting the reduction measures established to meet the County's reduction targets."</i> Also see discussion regarding the County's CAP in Section 3.1.5 and Appendix H to this Draft PEIR."</p> <p>Good legalize, but YOU GOT TO BE KIDDING ME! Please explain how this lack of information or government irresponsibility will change:</p> <ul style="list-style-type: none"> • The fact that increased GHG emissions are a cause of health related issues. • County of San Diego - Carlsbad is already the #6 worst metropolitan community out of 226 in the nation according to the American Lung association, <p>How the new commercial airport with lot, lot, lot more pollution from the increased flights will not be in compliance with AB 32.</p> <p>As stated earlier, the County is the responsible to manage ALL nonfederal ground facilities, including any ground property that will generate GHG pollution. Consequently, the County has the responsibility to control all GHG output related to aircraft, vehicles and any other air polluting gases ON THE GROUND.</p> <p>PLEASE EXPLAIN, in a RE-REcirculated PEIR as land managers, how the County intends to comply with all land management regulations.</p>	<p>↑ R-I27-18 cont.</p> <p>R-I27-19</p>
4	Page 3-121 & 2	<p>"PAL 1</p> <p>At full buildout of the Master Plan Update in 2036, under the PAL1 forecast, the Proposed Project is estimated to result in the consumption of approximately 677,513 gallons of aviation fuel annually. ...</p> <p>Therefore, compared to the No Project condition, as shown in Table 3.1.10-3 PAL1 would result in an annual increase in consumption of</p>	<p>R-I27-20</p> <p>↓</p>

		<p>142,042 gallons (5,404,698 kWh) increase of aviation fuel. ..."</p> <p>Please address the discrepancy in what seems to be a grossly underestimated 704,300 gallons given the County Q1 -2018 report states it has already sold 1,221,000 gallons.</p> <p>When completed a RECIRCULATION of this document will be required.</p>	R-I27-20 cont.
5	Page 3-122	<p>PAL 2</p> <p><i>"At full buildout of the Master Plan Update in 2036 under the PAL2 forecast, the Proposed Project is estimated to result in the consumption of approximately 704,300 gallons of aviation fuel annually. APU and GSE would consume an additional 95,291 gallons annually. Mobile sources associated with tenants and patrons of the Proposed Project are estimated to consume 569,432 gallons of gasoline and 31,660 gallons of diesel annually."</i></p> <p>Please address the discrepancy in what seems to be a grossly underestimated 704,300 gallons given the County Q1 -2018 report states it has already sold 1,221,000 gallons.</p> <p>When completed a RECIRCULATION of this document will be required.</p>	R-I27-21
6	Page 3-123	<p>"With the adherence to the increasingly stringent building and vehicle efficiency standards as well as implementation of the Proposed Project's design features that would reduce energy consumption, the Proposed Project would not contribute to a cumulative impact to the wasteful or inefficient use of energy. As such, the Proposed Project would not result in a cumulatively considerable impact on energy."</p> <p>Please provide the documentation justifying this statement.</p> <p>When Completed a RECIRCULATION of this document will be required.</p>	R-I27-22
7	Page 3-123	<p>3.1.10.4 Conclusion</p> <p>"Energy would be consumed through daily airport activities as well as daily vehicle use by employees and patrons. While the long-term implementation of the Master Plan Update would result in an increase in energy consumption compared to existing conditions, this increase would result in less than significant impacts."</p> <p>Please provide the documentation justifying this statement.</p>	R-I27-23
8	Page 3-124	<p><i>"In addition to the safety benefits of the Proposed Project, continuing to accommodate commercial air service in the North County as an alternative for passengers to use instead of driving to SDIA or other larger airports provides a regional reduction in vehicle fuel consumption. The project design features included in the Master Plan Update also include energy conservation measures that were not quantified due to the uncertainty of patron and tenant participation, such measure to provide the infrastructure necessary to accommodate the future use of solar photovoltaic panels and/or systems and a recharging stations for electric vehicles. These measures would further promote energy-efficiency and reduce future demand for energy from the Proposed Project. Overall, the Proposed Project therefore would not result in an</i></p>	R-I27-24

		<p><i>inefficient, wasteful and unnecessary consumption of energy as described in Appendix F of the CEQA guidelines."</i></p> <p>Throughout this Plan it refers to today's airline industry and ignores the "Paradigm Shift" about to happen for high speed and fully autonomous ground transportation starting in 2019. When that shift is included it must be asked if there is a profitable future for an expanded regional airport.</p> <p>PLEASE PROVIDE A DETAILED ANALYSIS OF THE NEGATIVE IMPACT of the next five year shift in autonomous and high speed ground transportation will have on this plan.</p> <p>When completed a RECIRCULATION <u>of that section will be required for Public Review.</u></p>	R-I27-24 cont.
9	Page 3-124 Section	<p>There is no mention of the fact unless connecting commuter air service has an interline agreement with other carriers, there is no time savings by flying out of CRQ. In fact, if there is no interline agreement by the air carrier flying out of CRQ, passengers will be forced to:</p> <ul style="list-style-type: none"> • claim baggage • recheck baggage • re-clear TSA security <p>PLEASE EXPLAIN why this is not relevant and is not mentioned when talking about the fictitious time savings of maybe 30 minutes drive.</p> <p>When completed a RECIRCULATION <u>of that section will be required for Public Review.</u></p>	R-I27-25

Item #	Document Page # & Section #	Figures associated with Runway Protection Zone	
1 -ALL Pages	For ALL Figures	<p>RPZ's need to be as long as possible for that unforeseen emergence, YET the new recirculated documents show a considerably smaller RPZ.</p> <p><u>Please explain:</u></p> <ol style="list-style-type: none"> 1. How in an emergency for C/D-III aircraft (that can be upwards of 150,000 lbs. at Maximum Take-off Weight) the RPZ in 99% of the figures is smaller than the RPZ of today's airport. 2. Figure 4-1, 4-1b, 4-2b,4-3b,4-4b,4-5b, and 4 -6b ALL show an incorrect RPZ on the West End according to the 2010 ALUCP. Today, the RPZ is considerably longer and extending to the office building at the West End of the runway. 3. How will today's mix of B-II aircraft be accommodated with a smaller RPZ? Or is the answer as Supervisor Bill Horn stated in his December 2015 statement, "it time for them to move out", the new airport will not have to worry about the B-II aircraft. <p>If the supervisor's statement in #3 is correct -a new recirculated PEIR must be written to correct the fact the present PEIR states these aircraft will be accommodated on the south side of the airport.</p> <p>No matter what the answer, I look forward to another RECIRCULATED Master Plan PEIR with the correct RPZ's comparisons shown.</p>	R-I27-26
2	Page 3-64	<p><i>"In the absence of state or local thresholds for GHG emissions from aviation sources, State CEQA Guidelines Appendix G criteria shall apply to determine if the proposed project would result in a significant impact. For non-aircraft operational and construction GHG sources, the County has identified a project specific annual screening level to determine if additional analysis is required."</i></p> <p>Given CRQ's past failures to meet EPA standards:</p> <ul style="list-style-type: none"> • Failed 2011 EPA Lead testing • EPA's 2014 NTI's Airport Inventory lists CRQ in the top 30 of 20,000 most worst airports when it come to lead contamination. 	R-I27-27

		<p>Why is that project not already included in the PEIR for public review?</p> <p>After so many years in preparing the PEIR, it should already been completed. How else can the County Board of Supervisors be expected to approve this Plan?</p> <p>That project needs to be completed in a recirculated document for public comment.</p>	R-I27-27 cont.
3	Page 3-70	<p>"Guideline for the Determination of Significance</p> <p>A significant impact from GHG emissions would result if the Proposed Project would:</p> <ul style="list-style-type: none"> Conflict with an applicable plan, policy or regulation adopted for reducing the emissions of GHGs. <p>Analysis</p> <p><u>"Due to the unique nature of the Proposed Project, state and local GHG reduction plans have limited applicability.</u> For example, the Scoping Plan does not contain any measure or goal requirements for aviation-related GHG emissions; thus, the Scoping Plan would achieve the identified statewide goals for 2020 and 2030 regardless of aviation activity. Similarly, the County's CAP does not contain a measure or goal requirements for aviation-related GHG emissions, and it would achieve the CAP objectives regardless of aviation activity. Therefore, the focus of this analysis is on non-aviation sources, such as existing facilities operated by the County and mobile sources."</p> <p><u>The above is one and only one of many examples</u> in this plan OF the County NOT accepting its fiduciary responsibility to protect the airports surrounding communities citizens health.</p> <p><u>PLEASE EXPLAIN</u> with an airport and its aircraft being classified as one of the most GHG polluting environments by the worldwide EPA's, how the above is relevant to this plan.</p> <p>Fact - scientific studies worldwide are now overwhelming being accepted that GHG emissions contributing to:</p> <ol style="list-style-type: none"> 1. Global Warming 2. Negatively impact the health of airport workers and the citizens in the airports surrounding communities. <p>It may be justifiably correct, to state <u>"Due to the unique nature of the Proposed Project, state and local GHG reduction plans have limited applicability."</u>, BUT for a government agency to justify the fact there is a loophole in the law allowing it to justifying negatively impacting the health of its citizenry is nothing but immoral.</p>	R-I27-28

		<p>Why is that project not already included in the PEIR for public review?</p> <p>After so many years in preparing the PEIR, it should already been completed. How else can the County Board of Supervisors be expected to approve this Plan?</p> <p>That project needs to be completed in a recirculated document for public comment.</p>
3	Page 3-70	<p>"Guideline for the Determination of Significance</p> <p>A significant impact from GHG emissions would result if the Proposed Project would:</p> <ul style="list-style-type: none"> • Conflict with an applicable plan, policy or regulation adopted for reducing the emissions of GHGs. <p>Analysis</p> <p><u>"Due to the unique nature of the Proposed Project, state and local GHG reduction plans have limited applicability.</u> For example, the Scoping Plan does not contain any measure or goal requirements for aviation-related GHG emissions; thus, the Scoping Plan would achieve the identified statewide goals for 2020 and 2030 regardless of aviation activity. Similarly, the County's CAP does not contain a measure or goal requirements for aviation-related GHG emissions, and it would achieve the CAP objectives regardless of aviation activity. Therefore, the focus of this analysis is on non-aviation sources, such as existing facilities operated by the County and mobile sources."</p> <p><u>The above is one and only one of many examples</u> in this plan OF the County NOT accepting its fiduciary responsibility to protect the airports surrounding communities citizens health.</p> <p><u>PLEASE EXPLAIN</u> with an airport and its aircraft being classified as one of the most GHG polluting environments by the worldwide EPA's, how the above is relevant to this plan.</p> <p>Fact - scientific studies worldwide are now overwhelming being accepted that GHG emissions contributing to:</p> <ol style="list-style-type: none"> 1. Global Warming 2. Negatively impact the health of airport workers and the citizens in the airports surrounding communities. <p>It may be justifiably correct, to state <u>"Due to the unique nature of the Proposed Project, state and local GHG reduction plans have limited applicability."</u>, BUT for a government agency to justify the fact there is a loophole in the law allowing it to justifying negatively impacting the health of its citizenry is nothing but immoral.</p>

R-127-28
cont.

		<p><u>PLEASE PROVIDE</u> the scientific studies showing the airport's increase planned Tons and Tons and Tons of GHG activity WILL NOT negatively impact the airports surrounding communities:</p> <ol style="list-style-type: none">1. Health.2. Reduce the quality of education.3. Not increase children attention deficit disorders both in school and out of school.4. Property Values.5. Tourism tax revenues.
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R-I27-28
cont.

Item #	Document Page # & Section #	<h2 style="text-align: center;">Supplement to Draft PEIR Appendix H</h2>	
1	Page 3 of 16 Paragraph 2	<p>"The Airport is a public-use airport required to abide by federal law and cannot restrict type, kind, or class of aircraft using the facility. The Federal Aviation Administration (FAA) has sole jurisdiction over aircraft in flight and movement within the airfield under the purview of the FAA's Air Traffic Control Tower. Reflecting this jurisdictional issue, California's statewide GHG guidance prescribes methods to meet GHG emissions goals without relying on reduced or mitigated aircraft emissions: the CARB Scoping Plans specifically exclude aircraft emissions and do not identify any state or local measures for reducing emissions from aviation sources. The County's CAP analysis therefore excludes aircraft emissions—which is consistent with the CEQA analysis of other public California airport projects* . It focuses instead on airport vehicles, facilities, buildings, and other emissions sources within the County's control.</p> <p>The following general measures are taken directly from the CAP's "Consistency Review Checklist" to determine applicability to the project:</p> <ul style="list-style-type: none"> • Measure 1a. – Reducing Vehicle Miles Traveled" <p>This whole section ignores the fact the County's airport plan project up to 1,000,000 commercial enplanement and deployment passengers. <u>Additionally, it ignores the reason given for the expansion of the airport - the Private Enplanement and Deplanement growth.</u></p> <p>What's more the County projects each passenger will require 2.6 car trips. It is true with the airport loophole the County is not responsible to include those 2,600,000 commercial passenger and <u>the untold private passenger car trips</u> as long as they are on airport property, BUT PLEASE PROVIDE the required CAP calculations and impact when those 2.6 MILLION commercial passenger and <u>the untold private passenger car trips</u> when they arrive and exit the airport onto Carlsbad and County roads.</p> <p>When completed a <u>RECIRCULATION</u> of that section will be required for Public Review.</p>	R-I27-29

Item #	Document Page # & Section #	Energy Modeling Calculations Appendix J	
1	This whole section	<p>WOW a lot of facts. BUT, this entire section ignores the fact the increased aircraft noise and jet exhaust will force increased energy use.</p> <p>2019 - Supervisor Bill Horn speaking at the opening of the new CRQ passenger terminal - <i>"This is Carlsbad, you don't even turn on the air conditioning. You just open the windows and doors."</i></p> <p>Today and for the last 50 years or more that is a true statement. Also that statement not only applies to Carlsbad, but for the other airport surrounding communities.</p> <p>PLEASE PROVIDE the accounting for the increase electrical generation cost and useage for approximately 250,000 users being forced to use of air conditioning as a result of NOT being able to <i>"...Just open the windows and doors."</i></p> <p>When that accounting is completed, a <u>RECIRCULATION of this section will be required for Public Review.</u></p>	R-I27-30
2	Is this not a forced \$50,000 or more tax to homeowners?	<p>Please explain:</p> <ul style="list-style-type: none"> • How the County feels forcing the airport surrounding communities to spend upwards of \$50,000 per household to insulate themselves from the increased aircraft noise is not identified in this section or anywhere else in the Plan. • WHY the annual ongoing increase in the electric monthly utility bills should not be considered an forced increase by the County to our cost of living as a tax. • WHY the public will be forced to pay an increased tax to maintain some quality of life to try and insulate themselves from the increase and eventually constant aircraft noise. • Why such a dramatic increase in cost of living does not requires a vote of the electorate impacted by the County's decision to benefit so few as the Plan indicates. 	R-I27-31

Response to Letter R-I27**Graham Thorley**

- R-I27-1** This comment consists of the commenter's email to the County with introductory remarks. No response is required.
- R-I27-2** This comment states the recirculated document are void of addressing environmental issues discussed in the commenter's original letter. The comment requests additional information and analysis regarding air quality and water quality. The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required.
- R-I27-3** The comment does not provide input related to the recirculated Draft PEIR subjects. The topics raised in this comment were analyzed under the PEIR. Also, please refer **Response to Comment Letter I73**. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I27-4** This comment states the PEIR is inadequate and should be recirculated again, but the comment does not identify specific or detailed issues concerning the PEIR's environmental analysis. Therefore, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I27-5** This comment states the Airport continues to contribute GHG and noise pollution in the community. Noise was not one of the subjects recirculated for public review; therefore, please refer to the County's previous responses to the commenter regarding noise. Nonetheless, the commenter's concerns of aircraft noise are addressed in **Response to Comment I73-6**, which confirms that because the commenter's location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required.
- Regarding GHG emissions, potential emissions associated with the Proposed Project were quantified and described in the recirculated PEIR Section 3.1.5, which concluded that impacts would be less than significant. No further response is required.
- R-I27-6** This comment includes greenhouse gas (GHG) facts and data as identified by the commenter. A discussion and analysis of GHG emissions was included in the recirculation documents; however, this comment does not provide specific or detailed issues concerning the PEIR's environmental analysis. Therefore, no changes to the PEIR have been made in response to this comment.
- R-I27-7** This comment assumes more GHG emissions would be created by larger aircraft thereby necessitating taxpayer funding to mitigate this increase in emissions. A discussion and analysis of GHG emissions was included in the recirculation documents concluding GHG emissions would result in a less than significant impact. This comment does not provide specific or detailed issues concerning the PEIR's environmental analysis. Therefore, no changes to the PEIR have been made in response to this comment.

- R-I27-8** This comment states the PEIR should be recirculated again. The comment does not identify specific or detailed issues concerning the PEIR's environmental analysis. Therefore, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I27-9** This comment includes a Table of Contents of the commenter's letter. No response is required.
- R-I27-10** This comment requests information related to wildlife hazards and bird strikes at the Airport. The Airport currently maintains a Wildlife Hazard Management Plan (WHMP), which is intended to manage and reduce the risks that wildlife pose to aircraft operations. The Proposed Project does not propose any changes to the WHMP since it is an existing plan that would continue to be utilized at the Airport regardless of the Proposed Project. Therefore, no changes to the PEIR have been made in response to this comment.
- R-I27-11** This comment heading cites the Biological Resources chapter of the PEIR; however, the comment text asks the County to explain how aircraft noise affects human health. The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment (i.e., Noise) was analyzed under the Draft PEIR and associated responses to public comments. No changes to the PEIR have been made in response to this comment, and no further response is required.
- R-I27-12** This comment includes an excerpt from the Draft PEIR's conclusion to biological resources, which states that consultation and permitting would occur with applicable regulatory agencies. Specifically, the comment requests the County to identify which agencies have been consulted or why the PEIR is adequate if no consultation has occurred. As stated in the PEIR, the exact scope, scale, and timing for implementation of each proposed element are not yet defined because project-specific information has not been fully developed to quantify exact impacts. Once individual project elements are proposed, additional analysis under CEQA will be required for projects at the time that they are designed and proposed. At that time, the County would determine which regulatory agencies would be involved. No changes to the PEIR have been made in response to this comment.
- R-I27-13** This comment heading cites the Biological Resources chapter of the PEIR; however, the comment text is related to methane gas release from the inactive landfill. For a discussion of methane gas in response to this commenter, please refer to **Responses to Comment Letter I74**. The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required.
- R-I27-14** This comment includes an excerpt from the Draft PEIR's analysis of jurisdictional waters and wetlands. The comment disagrees with the analysis citing a previous LEA monitoring report. This comment heading cites the Biological Resources technical report for the Proposed Project; however, the comment text is related to water quality and maintenance of the inactive landfill, which were not included in the recirculated Draft PEIR subjects. The topics raised in this comment were analyzed under the Draft PEIR and associated responses to public comments. No changes to the PEIR have been made in response to this comment, and no further response is required.
- R-I27-15** This comment heading cites the Biological Resources technical report for the Proposed Project; however, the comment requests information related to methane gas and

underground fires. As this comment includes a request for information, it does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required.

R-I27-16 This comment describes the commenter's dissatisfaction with the PEIR Section 3.1.10, and the commenter requests "factual information complying with today's regulations." The PEIR Section 3.1.10 includes specific quantitative calculations associated with energy use and consumption. While this comment disagrees with the PEIR's analysis, this comment does not provide specific input or remarks to be addressed. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required.

R-I27-17 The comment asks the County to explain why the PEIR Section 3.1.10 (Energy) cites that 535,471 gallons of aviation fuel are consumed annually when the County's published Fuel Flowage report for 2018 first quarter shows a combined delivery of 1,221,000 gallons.

First, the 2018 data published on the County website identifies the quantity of aviation fuel that was *delivered* to the Airport, but it does not identify how or when that fuel would be used. In contrast, the PEIR specifically identifies the quantity of aviation fuel used by aircraft. Second, for the purposes of calculating air quality and GHG emissions produced by aircraft, the FAA-approved Aviation Environmental Design Tool (AEDT) was used, which calculated fuel usage based on the Proposed Project's aircraft operations forecast and fleet mix. In other words, as a function of the AEDT model, the County quantified the estimated fuel usage by identifying the number of aircraft operations and fleet mix projected through 2036. Therefore, the data is based on substantial evidence and is sufficient for the PEIR analysis. Third, the aircraft fleet mix using the Airport in 2018 is projected to change overtime through 2036 as documented in the Master Plan Update. As discussed in the recirculated Draft PEIR GHG chapter, the FAA is continuously working to improve aviation energy efficiency, including its Continuous Lower Energy, Emissions, and Noise (CLEEN) Program. Therefore, it is anticipated that aircraft fuel efficiency would continue to improve, and it is reasonable that aircraft utilizing the Airport in 2036 at the Master Plan's full implementation may consume less fuel than aircraft today in 2018.

Therefore, the County finds that the PEIR analysis is correct and does not require revision. The recirculated Draft PEIR Energy chapter contains sufficient quantifications of energy usage, and no changes to the PEIR have been made in response to this comment.

R-I27-18 This comment heading cites the Energy Use and Conservation chapter of the PEIR; however, the comment cites FAA responsibilities concerning aircraft in flight. The comment includes a presumed quote from FAA stating that FAA is not responsible for an increase in takeoffs and that responsibility lies with the airport. For a discussion of FAA, County, and pilot responsibilities, please refer to **Master Response 7**. The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required.

R-I27-19 This comment heading cites the Energy Use and Conservation chapter of the PEIR; however, the comment text refers to the recirculated Draft PEIR GHG analysis. As stated in the recirculated Draft PEIR GHG chapter and its appendices, the Proposed Project would result in less than significant impacts related to GHG emissions.

Specifically, the aforementioned documents demonstrate and explain that the Proposed Project would not conflict with the goals of AB 32.

The comment also states that the County has the responsibility to control all GHG emissions related to aircraft. Please refer to **Master Response 7**. Also, as noted in the recirculated documents, the County has no authority over the quantity, type, or flight track of an aircraft arriving or departing from the airport, which are under the jurisdiction of the FAA. Because the County has no authority to regulate aircraft or their emissions at CRQ, there is no applicable methodology or threshold with which to evaluate their significance. In addition, the AB 32 Climate Change Scoping Plan states, “the State does not have regulatory authority over aviation” and “ARB has not identified aviation specific measures.” Improvements in aircraft design and technology and future growth or decline in passengers would occur independently of whether or not the Proposed Project is implemented.

No changes to the PEIR have been made in response to this comment, and no further response is required.

- R-I27-20** Please refer to **Response to Comment R-I27-17**. The County finds that the PEIR analysis is correct and does not require revision. The recirculated Draft PEIR Energy chapter contains sufficient quantifications of energy usage, and no changes to the PEIR have been made in response to this comment.
- R-I27-21** Please refer to **Response to Comment R-I27-17**. The County finds that the PEIR analysis is correct and does not require revision. The recirculated Draft PEIR Energy chapter contains sufficient quantifications of energy usage, and no changes to the PEIR have been made in response to this comment.
- R-I27-22** The comment requests for documentation justifying the identified statement from the PEIR Energy Use and Conservation chapter. This chapter includes specific quantitative analysis and narrative discussion of potential energy use conservation. While this comment asks for additional information, this comment does not provide specific input or remarks to be addressed. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required.
- R-I27-23** The comment requests for documentation justifying the conclusion statement. PEIR Section 3.1.10.2 includes specific quantitative analysis demonstrating that the Proposed Project would result in less than significant impacts. No changes to the PEIR have been made in response to this comment, and no further response is required.
- R-I27-24** This comment includes an excerpt from the PEIR Chapter 3.1.10 conclusion. The comment requests a detailed analysis of how autonomous and high speed ground transportation could affect the Master Plan Update over the next five years. The Draft PEIR previously disclosed the changes in transportation as a result of the Proposed Project. Furthermore, it would be inappropriate to speculate the potential effect of theoretical conditions described by the commenter. No changes to the PEIR have been made in response to this comment, and no further response is required.
- R-I27-25** The comment states there would be no time savings by utilizing commercial airline service at the Airport. Presumably, this is in reference to the PEIR Section 3.1.10, which states that a regional reduction in vehicle fuel consumption may occur by accommodating commercial air service in northern San Diego County as an alternative for passengers instead of driving to San Diego International Airport (SDIA) or other larger airports. Section 3.1.10 does not analyze time savings of utilizing the Airport

instead of SDIA. Rather, it identified the fuel savings that may be expected to occur if northern San Diego County residents and businesses utilize McClellan-Palomar Airport instead of using more gasoline to travel to SDIA. Nonetheless, while there may be fuel savings, this efficiency was not assumed in the Draft PEIR's quantified analysis. No changes to the PEIR have been made in response to this comment.

R-I27-26 The comment asks why the projected RPZs as reflected in the recirculation documents are smaller than the current RPZs. Please refer to **Master Response 11 (Runway Protection Zones)**.

The comment also states the RPZ on the runway's western end is incorrect according to the ALUCP. As noted in the PEIR, the ALUCP is required to use and be based on the long-range master plan or Airport Layout Plan (ALP) for an airport. As such, alterations to Runway 06-24 (including its RPZs) would require an update to the Airport's ALUCP for changes in noise contours, safety zones, and/or land use type or density policies. At this time, it is not known how the ALUCP, which is published by the San Diego County Regional Airport Authority (SDCRAA), would be updated to reflect the Master Plan Update. Upon a decision of a selected alternative by the County Board of Supervisors, County staff will initiate revisions to the ALP in consultation with the FAA and SDCRAA, as appropriate. Furthermore, at this time it is not known how the ALUCP revisions by the SDCRAA would affect the City of Carlsbad General Plan and associated documents. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

The comment also asks how B-II aircraft will be accommodated with a smaller RPZ. As noted in the PEIR Chapter 1, RPZs provide for the unobstructed passage of landing aircraft through the airspace and are used to enhance the protection of people and property on the ground. The purpose of an RPZ is to place limitations on obstructions at the ends of a runway. Therefore, if the project alternative selected by the Board of Supervisors consisted of a B-II, then the RPZs would be revised to correspond with the FAA's guidance for a B-II aircraft. However, if a C-III or D-III alternative is selected, this would provide for a larger safety area and would have no effect a B-II aircraft's ability to depart or arrive at the Airport.

R-I27-27 This comment heading cites the Figures associated with RPZs. However, the comment text includes an excerpt from the Draft PEIR GHG chapter. Specifically, the commenter requests the PEIR be recirculated for public comment, but there is insufficient information in this comment to determine the basis for this claim.

The comment also includes remarks concerning lead testing and contamination. Lead is not defined as a GHG pollutant, and lead is addressed in the PEIR and **Response to Comments 173-29**. Therefore, the comment does not provide input related to the recirculated Draft PEIR subjects. No changes to the PEIR have been made, and no further response is required.

R-I27-28 This comment heading cites the Figures associated with RPZs. However, the comment text includes excerpts from the Draft PEIR GHG chapter. Specifically, the commenter requests scientific studies showing whether the Airport's increase in GHG emissions would impact the surrounding communities. This quantitative analysis was provided in the recirculated Draft PEIR GHG chapter and its associated appendices. The analysis concluded that impacts from GHG emissions associated with the Master Plan Update would be less than significant. No changes to the PEIR have been made.

- R-I27-29** This comment includes an excerpt from the Draft PEIR's GHG Emissions Analysis Memorandum. The comment states the County is projecting up to 1,000,000 commercial enplanements. This is incorrect as the Master Plan Update states the highest growth forecast (Scenario 2) would reach 575,000 annual enplanements.

The comment also states that the Airport could reach up to 2.6 million annual enplanements, and the commenter presumably requests the PEIR be revised to reflect GHG emissions associated with 2.6 million annual enplanements.

None of the forecasted annual enplanements have changed since the Draft PEIR was initially published. The Draft PEIR correctly identified a maximum growth forecast of 575,000 annual enplanements. Furthermore, the Draft PEIR GHG chapter was recirculated in part to address the adopted CAP. However, as noted in the recirculated GHG chapter, the CAP cannot be used to streamline the review of GHG emission from the Proposed Project.

- R-I27-30** The comment requests the County to identify the increase in electricity generation costs and usage for 250,000 users to use air conditioning. Specifically, the commenter requests the PEIR be recirculated for public comment, but there is insufficient information in this comment to determine the basis for this claim. Furthermore, it would be inappropriate to speculate the potential effect of theoretical conditions described by the commenter. The recirculated Draft PEIR Energy chapter contains sufficient quantifications of energy usage, and no changes to the PEIR have been made in response to this comment.

- R-I27-31** This comment heading cites the Energy Modeling Calculations recirculated with the PEIR. However, the comment asks questions related to aircraft noise, electricity costs, and an electoral vote on the Master Plan Update.

The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter R-I28

From: romckinley@akfm.com
Sent: Monday, August 06, 2018 5:26 PM
To: LUEG, PalomarMP
Subject: FW: Comment Letter on MPU.pdf
Attachments: Comment Letter on MPU.pdf

Please find attached comment letter on the recirculated portions of the MPU.

R-I28-1

Best Regards,

Ryan O. McKinley, Esq.
FREELAND McKINLEY & McKINLEY
402 W. Broadway, Ste. 1815
San Diego, Ca. 92101
Phone: 619-297-3170
FAX: 619-255-2833

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Steven A. McKinley*

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ATTORNEYS AT LAW

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4760 S. Pecos Rd.

Suite 103

Las Vegas, NV 89017

August 6, 2018

Cynthia Curtis, Environmental Planning Manager
County of San Diego
Department of Public Works
5510 Overland Avenue, Suite 410
San Diego, CA 92123

**Re: Comments on recirculated portions of McClellan-Palomar Airport Draft
Environmental Impact Report.**

Dear Ms. Curtis,

This firm is privileged to represent Michael Durkin, a resident of San Diego County (the "County") and the owner of property near the McClellan-Palomar Airport (the "Airport"). On March 19, this firm, on behalf of Mr. Durkin, provided a public comment letter on the initial draft of the McClellan-Palomar Airport Draft Environmental Impact Report ("DEIR"). The letter requested the County provide an explanation for its failure to ensure that the areas adjacent to the Airport are properly protected from the hazards associated with airport operations. In short, the letter requested the County:

1. Clearly and accurately state the federal rules, regulations, and guidelines related to the Runway Protection Zone ("RPZ"), and the reasons those rules, regulations, and guidelines exist;
2. Clearly and accurately state the actions the County intends to take to comply with the federal rules, regulations, and guidelines related to the RPZ, and to ensure the safety of its residents; and
3. Clearly and accurately state the risks associated with the County's failure to protect the RPZ and overriding interest the County considered to take priority over the safety of its residents.

R-I28-2

It is important the public be informed of the dangers of incompatible land use in the vicinity of the airport; particularly with respect to the FAA-defined RPZ. More than half of aircraft mishaps occur in the FAA-defined RPZ. The County should pay particular heed to informing the public of the risks within the Airport's West RPZ, which has already had at least two airplane collisions occur in the last 15 years. These collisions can easily be turned from isolated tragedies into catastrophes merely by allowing people to congregate in the RPZ.

When the County released revisions to the DEIR, it failed to provide any explanation of the County's failure to protect the RPZ in accordance with FAA regulations. Additionally, the "recirculated portions" of the DEIR related to the Runway Protection Zone require further explanation. The County's RPZ-related revisions were limited to the revision of certain demonstrative figures and the inclusion of certain new demonstrative figures. The purpose of the recirculated portions of the DEIR, according to the County, is "...to provide the public more detailed information on how shifts to the runway and RPZs may affect land use by alternative." However, the new figures raise more questions than they answer. In order

R-I28-3

August 6, 2018

Page 2 of 3

for the public to be adequately informed related to the important issue of public safety from airport operating hazards, the County should:

1. Explain the reasons, including changes of rules, regulations, or standards (if any) for the revision of the West RPZ dimensions shown in Figure 1-4; and
2. State all rules, regulations, or standards which justify the inconsistency in dimensions in the East and West RPZs as demonstrated in the various figures in the recirculated portions of the DEIR.

The County should explain the reasons for the revision of the West RPZ dimensions in the recirculated Figure 1-4.

R-I28-3
cont.

In the initial draft of the EIR, the County included a demonstrative figure which purportedly represented the “Parcels in the Runway Protection Zone” (“Figure 1-4”). In the initial version of Figure 1-4, the West RPZ was depicted including within its boundaries at least 6 parcels for which the County does not own a sufficient interest to protect from airport hazards. Among these parcels is one upon which an office building has been developed and is currently used as such by up to 100 people. This use is clearly incompatible with the FAA defined RPZ, as it allows for an assembly of people which would be particularly vulnerable to a hypothetical aircraft accident.

Without explanation, the County re-drew the boundaries of the RPZ on Figure 1-4 when it issued its revisions of the EIR. The re-drawn boundaries of the RPZ in the revised version of Figure 1-4 inexplicably excludes 2 of the 7 parcels which were originally included in the boundaries of the West RPZ. One of the two omitted parcels is that which is developed with the incompatible office building use.

R-I28-4

The County needs to clarify the reason for the revision. If the County believes the dimensions used for the West RPZ as represented in the original version of Figure 1-4 were incorrect, it should state why. Additionally, it should clearly define the dimensions being used for the West RPZ in the revised Figure 1-4. When the County defines the dimensions being used, it should provide a basis for those dimensions using the applicable FAA airport design criteria which are found in FAA Advisory Circular 150/5300. Furthermore, it should provide explanation as to what criteria for RPZ design changed, for the current Airport and its proposed future modifications, between the original draft of Figure 1-4 and the revised and recirculated Figure 1-4, in order to ensure the public can accurately assess whether the County is adequately providing for public safety in its airport operations.

The County should explain the reasons for inconsistency in the dimensions of the East RPZ and the West RPZ.

In the figures released in the recirculated portions of the EIR, the County represents the East RPZ as being substantially larger than the West RPZ. Consequently, the East RPZ is consequently better protected, and airport operations pose a decreased risk of damage to people and property in the East RPZ. Conversely, the area in closest proximity to the West end of the Airport continues to have properties which are at risk from Airport operations.

R-I28-5

August 6, 2018

Page 3 of 3

The County should explain what criteria it used to develop the dimensions for the RPZs, and how those criteria resulted in differing dimensions between the two ends of the runway. The purpose of the RPZ - to protect people and property on the ground from hazards inherent to airport operations – is not adequately served by protecting only one end of the runway. If the County has chosen to allow safety hazards to exist in the vicinity of the Airport, it must so disclose. Alternatively, if the Airport requires special considerations which mandate departure from usual FAA guidelines regarding the RPZ, the County should disclose the basis for those considerations and how they alleviate the risks associated with assemblies of people in RPZs.

R-I28-6

Very truly yours,

FREELAND McKINLEY & McKINLEY



RYAN O. McKINLEY

Response to Letter R-I28

**Ryan McKinley, Freeland McKinley & McKinley
(representing Michael Durkin)**

- R-I28-1** This comment contains an email message from Ryan McKinley submitting comments to the County. No response is required.
- R-I28-2** This comment requests that the County explain the federal rules, regulations, and guidelines related to RPZs, state the actions the County intends to take to comply with such rules and ensure the safety of residents, and state the risks associated with County's failure to protect the RPZ. The comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. The County will include the comment as part of the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project. Regardless, the County confirms that it is committed – consistent with its federal sponsor obligations – to acquiring an easement or fee interest in all properties within airport RPZ to the extent feasible.
- R-I28-3** This comment requests that the County explain the standards applicable to RPZ dimensions, and state all rules and regulations that justify differences in RPZs located on the east and west ends of the runway. Please refer to the Master Plan Update Table 4.11, which identifies RPZ dimensions for Runway 06/24. Furthermore, the comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. The County will include the comment as part of the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I28-4** This comment requests that the County explain the revisions to the RPZ dimensions located on the runway's west end in the recirculated Figure 1-4. Please refer to **Master Response 11**. The comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. The County will include the comment as part of the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I28-5** This comment requests that the County explain the inconsistency between the dimensions of the RPZs located on the east and west ends of the runway. Please refer to the Master Plan Update Table 4.11, which identifies RPZ dimensions for Runway 06/24. Furthermore, the comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. The County will include the comment as part of the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I28-6** This comment summarizes the previous comments. The comment does not identify specific or detailed issues concerning the PEIR's environmental analysis. No changes to the PEIR have been made.

Comment Letter R-I29

From: Janis Murphy <deck55@aol.com>
Sent: Monday, August 06, 2018 4:50 PM
To: LUEG, PalomarMP
Subject: Palomar Airport

We are on total support of the proposed changes to Palomar Airport. Thank you

Chris and Janis Murphy
1678 BradyCircle
92008
Sent from my iPhone Janis

R-I29-1

Response to Letter R-I29**Chris and Janis Murphy**

- R-I29-1** This comment states the commenter's general support for the Proposed Project. The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter R-I30

From: Pia Romano <psromano24@ymail.com>
Sent: Monday, August 06, 2018 11:39 AM
To: LUEG, PalomarMP
Cc: Mayor Judy Ritter; Amanda Young Rigby; John Aguilera; John Franklin; Joe Green
Subject: Comments Re: Recirculated portions of Airport master plan update draft PEIR2

Hello Ms. Curtis,

I am a Vista resident and spent some time reviewing the Palomar Airport Master Plan Update PEIR2.

In the last few years, Vista residents (myself included) have been severely impacted by the noise of the airplane overflights as well the environmental impact of airplane fuel. No where in this updated report are any mitigation plans/efforts for the impacts of noise and airplane fuel particulates. The effects of noise and fuel particles have not be measured adequately and need to be in order to determine how to remedy these effects upon Vista Residents, not to mention Carlsbad residents.

R-I30-1

Traffic congestion is also a factor that was not adequately addressed in the EIR. I was looking at traffic maps of Vista between 2014-2017 and the traffic increased 3% each year (without any airport expansion). This EIR and current infrastructure does not account for that much traffic increase year over year. In addition, the airport expansion will increase traffic (likely more than 3% per year) particularly around the Carlsbad/Vista area (ie. Palomar Airport Road/El Camino Real and areas around that intersection).

R-I30-2

Another factor that was not addressed and according to what I understand, Carlsbad residents legally have the right to vote on this proposed Palomar Airport expansion and have not been given the opportunity to vote.

R-I28-3

For these reasons, I am adamantly against the expansion of McClellan Palomar Airport.

Sincerely,

Pia Romano
Vista 92081

Response to Letter R-I30**Pia Romano**

- R-I30-1** The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment (i.e., existing noise conditions) were analyzed under the Draft PEIR. Please refer to **Response to Comment Letter I85** in which I85-4 confirms that because the commenter's location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I30-2** The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment (i.e., transportation) were analyzed under the Draft PEIR. Please refer to **Response to Comment Letter I85**. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I30-3** The comment does not provide input related to the recirculated Draft PEIR subjects. Please refer to **Master Response 5** and **Response to Comment Letter I85**. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter R-I31

From: Suzie Thorley <suzie.thorley@sbcglobal.net>
Sent: Monday, August 06, 2018 11:26 AM
To: LUEG, PalomarMP
Subject: Comment on recirculated portions of the McClellan Palomar Airport Master Plan Update Draft Environmental Impact Report
Attachments: Suzie Comment Letter to County Recirculated.docx

Dear Ms. Curtis:

Attached are my comments on the Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report.

R-I31-1

Respectfully,

Suzanne Thorley

Cynthia Curtis, Environmental Planning Manager
 County of San Diego
 Department of Public Works
 5510 Overland Avenue, Suite 410
 San Diego, CA 92123

August 5, 2018

Re: Comments on Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft
 Environmental Impact Report

Dear Ms. Curtis:

I have owned my home in Carlsbad since 1978 when the airport hangared recreational and crop duster aircraft. Yes, I knew there was an airport nearby; however, I never imagined it to grow into a large Regional Airport for business and private jets whose pilots have little regard for citizens living near the airport. I admit I also enjoyed and used both United Express and American Eagle flights to LAX for connections elsewhere. Those commercial flights were never over my neighborhood and they were friendly neighbors by not flying during normal sleeping hours.

R-I31-2

I am still trying to figure out why the county is planning to expand CRQ.

- Currently, CRQ is safe enough for the aircraft utilizing the airport without extending the runway.
- There seems not to have a big outcry from pilots using CRQ for these improvements. Again, what is the motivation for this expansion? Please explain.
- As has been said at many meetings and workshops one aircraft that flies to China once a week needs the longer runway so it does not have to stop for fuel. In checking with the manufacturer website for that aircraft, the runway with the extensions STILL would not be long enough for that aircraft to fly nonstop to China taking off from CRQ without stopping for fuel. That seems like a huge cost to taxpayers for one aircraft when the extended runway still does not meet that requirement. I am truly having a difficult time wrapping my head around doing all this work and expense for **ONE** business jet with the loss of quality of life of at least one hundred thousand (100,000) citizens who would be affected.
- Understand that I am all for safety and improvements. Please explain how these "safety" improvements will really improve safety.
- Attracting a small carrier has not worked. These carriers usually do not have interline agreements with major carriers for ticketing and baggage. From CRQ a passenger has to fly to a connection city, deplane, claim baggage, usually change terminals, recheck baggage and go through TSA security again. This does not work for the majority of the flying public, not when they could drive to San Diego International Airport (SAN), Orange County Airport (SNA) or Los Angeles International Airport (LAX) in the same or less time with a lot less inconvenience of claiming baggage, changing terminals, checking bag, second security screening before boarding their second flight. Also, with no interline agreements and ticketing, if something happens with the first leg (misconnect, arrive late or cancellation) they are not usually protected on the second (connecting) leg as it is not considered a connection because it is a different ticket.
- It appears that the majority of users of CRQ are now business jets, many of whom fly frequently during normal sleeping hours and often do not follow the Voluntary Noise Abatement Procedures which makes for very bad neighbors. It would be helpful if there were some sort of penalty for pilots who violate these procedures.

R-I31-3

R-I31-4

R-I31-5

#	Revised PEIR Section/ Page #	RPEIR Position	Suzanne Thorley Comments																																																																																																																																				
1	Table 1.2.10-3 and Table 3.1.10-4 Page 3-126	Aircraft Fuel Consumption (PAL 1 and PAL 2) in Gallons	<p>Table 3.1.10-3. Fuel Consumption Comparison (PAL 1) (gallons)</p> <table><tr><th>Scenarios</th><th>Aircraft</th><th>APU/GSE</th><th>Gasoline</th><th>Diesel</th><th>TOTAL</th></tr><tr><td>No Project</td><td>535,471</td><td>70,100</td><td>298,355</td><td>16,589</td><td>920,515</td></tr><tr><td>PAL 1</td><td>677,513</td><td>83,273</td><td>301,910</td><td>16,786</td><td>1,079,482</td></tr><tr><td>Difference</td><td>142,042</td><td>13,173</td><td>3,555</td><td>197</td><td>158,967</td></tr></table> <p>Table 3.1.10-4. Fuel Consumption Comparison (PAL 2) (gallons)</p> <table><tr><th>Scenarios</th><th>Aircraft</th><th>APU/GSE</th><th>Gasoline</th><th>Diesel</th><th>TOTAL</th></tr><tr><td>No Project</td><td>535,471</td><td>70,100</td><td>298,355</td><td>16,589</td><td>920,515</td></tr><tr><td>PAL 2</td><td>704,300</td><td>95,291</td><td>569,432</td><td>31,660</td><td>1,400,683</td></tr><tr><td>Difference</td><td>168,829</td><td>25,191</td><td>271,077</td><td>15,071</td><td>480,168</td></tr></table> <p>The Tables on Page 3-126 show fuel consumption by aircraft. To focus on No Project on both tables, fuel consumption by aircraft on both tables is 535,471.</p> <p>On McClellan-Palomar Airport website, Fuel Flowage link sends me to the county site which has the table below for Jet A fuel in 1000s of gallons delivered for the first quarter. Notice that the total for the <u>quarter</u> is 1,146 (1000s of gallons or 1,146,000 gallons) delivered. If the next three quarters follow, there will be 4,584,000 gallons of jet fuel delivered to CRQ. Please explain how those numbers are so drastically different, a difference of 4,048,529 gallons.</p> <p>Sales by Supplier/FBO @ CRQ Jet A 1000s of gallons delivered 2018 1st Quarter</p> <table><tr><th>Fuel Supplier FBO</th><th>Jan</th><th>Feb</th><th>Mar</th><th>Apr</th><th>May</th><th>Jun</th><th>Jul</th><th>Aug</th><th>Sep</th><th>Oct</th><th>Nov</th><th>Dec</th><th>Total</th></tr><tr><td>AvFuel Atlantic Avia / PAC</td><td>166</td><td>286</td><td>240</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>692</td></tr><tr><td>Epic Jet Source</td><td>145</td><td>15</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>160</td></tr><tr><td>Ascent SCIF / Magellan</td><td>67</td><td>75</td><td>61</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>203</td></tr><tr><td>Western Western Flight</td><td>29</td><td>32</td><td>30</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>91</td></tr><tr><td>Total</td><td>407</td><td>408</td><td>331</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>1146</td></tr></table> <p>Since these numbers are so dramatically different, also affect the GHG calculations, the Draft EIR should disclose those emissions. Explain how much more GHG would be from this increase in fuel usage. This should be done in another revised and recirculated Draft PEIR.</p>	Scenarios	Aircraft	APU/GSE	Gasoline	Diesel	TOTAL	No Project	535,471	70,100	298,355	16,589	920,515	PAL 1	677,513	83,273	301,910	16,786	1,079,482	Difference	142,042	13,173	3,555	197	158,967	Scenarios	Aircraft	APU/GSE	Gasoline	Diesel	TOTAL	No Project	535,471	70,100	298,355	16,589	920,515	PAL 2	704,300	95,291	569,432	31,660	1,400,683	Difference	168,829	25,191	271,077	15,071	480,168	Fuel Supplier FBO	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	AvFuel Atlantic Avia / PAC	166	286	240	0	0	0	0	0	0	0	0	0	692	Epic Jet Source	145	15	0	0	0	0	0	0	0	0	0	0	160	Ascent SCIF / Magellan	67	75	61	0	0	0	0	0	0	0	0	0	203	Western Western Flight	29	32	30	0	0	0	0	0	0	0	0	0	91	Total	407	408	331	0	0	0	0	0	0	0	0	0	1146
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2	Revised Figure 1-4	Parcels with RPZs	Explain why the RPZs (1) Future RPZ appears to be smaller on the west end of runway (2) Future RPZ on east end appears to be shorter (3) Revised Figure shows only existing and future, previous figure showed Runway 06 Future, and Runway 24 RPZ future																																																																																																																																				
3	3.1.5.1 Page 3-55	County cannot	“FAA Order 5190.6B The County, as the owner of the Airport, currently accepts federal grant funding from the AIP. The County is therefore																																																																																																																																				

R-I31-6

R-I31-7

R-I31-8

		discriminate	<p>required to comply with a list of Airport Sponsor Assurances provided by the FAA. FAA Order 5190.6B: FAA Airport Compliance Manual, Grant Assurance 22a states that the County:</p> <p>“Will make [the] airport available as an airport for public use on reasonable terms, and without unjust discrimination, to all types, kinds, and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport.”</p> <p>Therefore, the County has no authority over the quantity, type, or flight track of an aircraft arriving or departing from the airport, which are under the jurisdiction of the FAA.”</p> <p>Why can the county NOT lease space to aircraft that are not within the airport classification? If size of aircraft is a safety issue for extending the runway, why encourage larger aircraft by allowing them to be hangared on the property?</p>	R-I31-8 cont.
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Thankfully, the city of Carlsbad has hired a law firm that has expertise in this field. I urge you to pay close attention to the City’s comments and request that the recirculated draft PEIR once again be updated and circulated with another 45 day comment period.

Respectfully,
Suzanne Thorley
760-930-1966

R-I31-9

Response to Letter R-I31**Suzanne Thorley**

- R-I31-1** This comment contains an email message by Ms. Thorley submitting comments to the County. No response is required.
- R-I31-2** This comment includes introductory remarks regarding the Airport's existing and historical activity and does not contain substantive issues. No response is required.
- R-I31-3** This comment states that the Airport is safe enough under current conditions without extending the runway. The comment includes additional remarks asking for an explanation or justification of the proposed improvements identified in the Master Plan Update. The topics raised in this comment were considered in the Draft PEIR that was previously published. The comment does not provide input related to the recirculated Draft PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs). Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I31-4** The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment pertains to commercial airline activity. Therefore, no changes to the Proposed Project PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I31-5** The comment does not provide input related to the recirculated Draft PEIR subjects. The topics raised in this comment (i.e., existing noise conditions) were analyzed under the Draft PEIR. Nonetheless, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations. In addition, please refer to **Master Responses 3 and 4**. Therefore, no changes to the Proposed Project PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- R-I31-6** The comment asks the County to explain why the PEIR Section 3.1.10 (Energy) cites that 535,471 gallons of aviation fuel are consumed annually when the County's published Fuel Flowage report for 2018 first quarter shows a different quantity.

First, the 2018 data published on the County website identifies the quantity of aviation fuel that was *delivered* to the Airport, but it does not identify how or when that fuel would be used. In contrast, the PEIR specifically identifies the quantity of fuel used by aircraft. Second, for the purposes of calculating air quality and GHG emissions produced by aircraft, the FAA-approved Aviation Environmental Design Tool (AEDT) was used, which calculated fuel usage based on the Proposed Project's aircraft operations forecast and fleet mix. In other words, as a function of the AEDT model, the County quantified the estimated fuel usage by identifying the number of aircraft operations and fleet mix projected through 2036. Therefore, the data is based on substantial evidence and is sufficient for the PEIR analysis. Third, the aircraft fleet mix using the Airport in

2018 is projected to change overtime through 2036 as documented in the Master Plan Update. As discussed in the recirculated Draft PEIR GHG chapter, the FAA is continuously working to improve aviation energy efficiency, including its Continuous Lower Energy, Emissions, and Noise (CLEEN) Program. Therefore, it is anticipated that aircraft fuel efficiency would continue to improve, and it is reasonable that aircraft utilizing the Airport in 2036 at the Master Plan's full implementation may consume less fuel than aircraft today in 2018.

Therefore, the County finds that the PEIR analysis is correct and does not require revision. The recirculated Draft PEIR Energy chapter contains sufficient quantifications of energy usage, and no changes to the PEIR have been made in response to this comment.

R-I31-7 Please refer to **Master Response 11 (Runway Protection Zones)**.

R-I31-8 The comment includes an excerpt from the PEIR regarding the County's requirement to comply with the FAA grant obligations. The comment asks the County whether it can restrict leasing space at the Airport for aircraft sizes that are not within the airport classification. Keeping with the FAA grant assurances, the County does not have the authority to limit how many aircraft use the Airport or to limit the size of the aircraft that use the Airport. Please refer to **Master Response 7**. Furthermore, the comment does not provide input related to the recirculated Draft PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs). Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

R-I31-9 The comment requests the County to review the City of Carlsbad's comment letter and to recirculate the Draft PEIR again. For responses to the City's letter, please refer to **Response to Comment Letter R-L3**. Furthermore, the comment does not identify specific or detailed issues concerning the PEIR's environmental analysis requiring recirculation. No changes to the PEIR have been made.

Comment Letter R-I32

August 6, 2018

Cynthia Curtis, Environmental Planning Manager
County of San Diego
Department of Public Works
5510 Overland Avenue, Suite 410
San Diego, CA 92123

Re: Comments on Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report (PEIR)

Dear Ms. Curtis:

Thank you for the opportunity to comment on the recirculated PEIR, which comments are as follows:

- Landfill Gas (Methane) Ongoing Violations and Ponding of Perched Groundwater Over a Portion of Landfill (Area of Concern) Determination:
 - o Ongoing series of Landfill Unit 1 violation (V) determinations of non-compliance reported since 1/29/2018 for Landfill gas (methane) exceeding the regulatory standard of 5% methane¹; and one Area of Concern (A) determination where:
 - "The area has reportedly been investigated previously and it was determined that the water coming up through the drain cover is perched ground water. Where the water is emerging is not over landfill, but the water is traveling towards the east and is ponding over a portion of the landfill, and there are cracks in the asphalt over the landfill which the water can seep into. Ponding (standing) water over the landfill is not allowed (Title 27 Section 20650) and is supposed to be removed by airport staff within 24 hours (after a rain event)."²
 - "With a global warming potential more than 25 times greater than CO₂ and a short (12-year) atmospheric life, methane is a potent greenhouse gas that is a key contributor to global climate change."³ Has the County included these landfill GHG (methane) emissions in its analysis, especially significant because the County appears to have an ongoing current and continuing issue as indicated by these data provided above?
 - Has the Regional Water Quality Control Board been apprised of the perched groundwater/ ponding over a portion of the landfill/ cracks in asphalt that the water can leak into, and what are potential impacts for increased groundwater contamination and future trends?
 - When were the asphalt cracks repaired and were measurements taken before the repair for landfill gas detections?
- EPA Lead Limit Violation:
 - o In 2012 EPA, in partnership with San Diego Air Pollution Control District (APCD,) performed a one-year lead emissions study on airports, including McClellan-Palomar Airport. For the McClellan-Palomar Airport "... data indicate that concentrations of lead at the specific McClellan-Palomar Airport monitor location measured a maximum three-month average of 0.17 µg/m³, which exceeds the national ambient air quality standard

¹ <http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AH-0002/Inspection/>

² <http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AH-0002/Inspection/431533/>

³ <https://www.epa.gov/lmop/benefits-landfill-gas-energy-projects>

for lead that EPA revised in 2008.”⁴ The APCD Annual Air Quality Monitoring Network Plan, 2016, reported:

- “The Airport study at Palomar Airport has officially concluded. McClellan-Palomar Airport did not pass the minimum tolerances established by the EPA. This required the District to sample for lead at Palomar Airport until such time as the measured concentrations are below the Federal standard for a minimum of three years (see 2012 Annual Network Plan for greater discussion). At the time of the writing of this report, measured concentrations for lead have meet the waiver criteria set forth in the 40 CFR Part 58, Appendix D, ‘Network Design Criteria for Ambient Air Quality Monitoring’, Section 4, ‘Pollutant-Specific Design Criteria for SLAMS Sites’, part 4.5 ‘Lead (Pb) Design Criteria’, subsection (iii), paragraph 4.5(a)(ii). If this trend continues, cessation of sampling at McClellan-Palomar Airport will be requested in 2018 (three continuous years of sampling at this location).”⁵
 - What are current lead measurement trends, and has a request been made for lead sampling cessation?
- Lead is a well-known highly toxic and persistent chemical in the environment. See the policy statement regarding prevention of of childhood lead toxicity from the American Academy of Pediatrics that my advisor, Dr. Bruce Lanphear ,contributed to as foot-noted.⁶ The United States EPA and the Center for Disease Control and Prevention (CDC) have stated that:
 - “EPA and the Centers for Disease Control and Prevention (CDC) agree that there is no known safe level of lead in a child’s blood.”^{7, 8}
 - “In 2011, the nonprofit Center for Environmental Health sued several avgas producers and suppliers in California under a state chemical disclosure law known as [Proposition 65](#), alleging that the companies failed to warn residents near 25 airports about lead pollution from piston-engined planes.”⁹

According to a Science Magazine article ‘Aviation fuel settlement may help phase out lingering source of U.S. lead pollution’, dated December 17, 2014:

- “Last week brought a milestone in that effort. The Center for Environmental Health (CEH), an advocacy group based in Oakland, California, announced a legal settlement with 30 companies that sell or distribute leaded avgas in California, bringing closure to a long-running lawsuit that had been closely watched within the small-aircraft community. Under the settlement, the companies must sell the lowest lead fuel that is commercially available in sufficient quantities, warn the public about the danger of lead exposure through signs posted at

R-I32-5
cont.

R-I32-6

⁴ http://www.4cleanair.org/sites/default/files/documents/SanDiegoLeadFactSheet_6-18-13v2.pdf

⁵ https://www.sdapcd.org/content/dam/sdc/apcd/monitoring/2016_Network_Plan.pdf

⁶ <http://pediatrics.aappublications.org/content/pediatrics/early/2016/06/16/peds.2016-1493.full.pdf>

⁷ [No safe blood lead level in children has been identified.](#)

⁸ <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>

⁹ <http://www.chicagotribune.com/news/ct-leaded-gas-planes-met-20140520-story.html>

- airports and notices sent to nearby residences, and pay a total of \$550,000 in penalties and legal costs.”¹⁰
- Has the public been warned about the danger of lead exposure through signs posted at the airport and notices sent to nearby residences?
- San Diego County Palomar Airport Flood Control Project:
- According to the county's Palomar Airport Flood Control Project Public Works website, the purpose of the project is “to construct an under ground water quality basin” or detention vault and:
 - “The intent of the project is to treat all storm water runoff within the existing airport storm drain system that eventually discharges into the (impaired, my insert) Agua Hedionda Lagoon. This runoff, which passes below an existing business park located immediately north of the airport property, will be monitored on-site and in downstream habitat in order to observe and quantify the results.”¹¹
 - According to the FY 2012 Carlsbad Watershed Urban Runoff Management Program (WURMP) Annual Report 2013, Attachment A:
 - “The County of San Diego designed and installed a water quality treatment facility (WQTF) at the McClellan-Palomar Airport completed in April of 2006. This work was funded by Proposition 13 State Water Resources Control Board (SWRCB) grant agreement number 04-201-559-0. The County conducts regular water quality monitoring at the WQTF to assess effectiveness.”¹²
 - The project design website page states that:
 - “The proposed project collects the combined flows and conveys them through a **diversion structure** that directs low flows through the proposed facility. Larger flows that exceed the capacity of the facility are not diverted and continue downstream through the 36-inch main line reinforced concrete pipe (RCP) alignment.”¹³
 - Has the County in its analysis considered the frequency and intensity of storms due to climate change that may impact the capacity and ability of the Palomar Airport underground water quality basin to treat run-off, especially in light of the fact that larger flows are not diverted and continue downstream where the impaired¹⁴ Agua Hedionda Lagoon is located?

R-I32-6
cont.

R-I32-7

Thank you again for the opportunity to comment.

Sincerely,
Mary Anne Viney
Carlsbad Resident
760-710-1425

¹⁰ <http://www.sciencemag.org/news/2014/12/aviation-fuel-settlement-may-help-phase-out-lingering-source-us-lead-pollution>

¹¹ <https://www.sandiegocounty.gov/content/sdc/dpw/flood/palomar.html>

¹²

http://www.projectcleanwater.org/images/stories/Docs/Carlsbad/CAR_WURMP_AR_1112.pdf

¹³ <https://www.sandiegocounty.gov/content/sdc/dpw/flood/palomar-design.html>

¹⁴

https://www.waterboards.ca.gov/water_issues/programs/tmdl/2014_16state_ir_reports/category5_report.shtml

Response to Letter R-I32**Mary Anne Viney**

R-I32-1 This comment includes introductory remarks regarding the existing inactive landfill. Specifically, the first part of this comment cites a methane exceedance as documented in the Local Enforcement Agency (LEA) Closed Disposal Site Inspection Report for an inspection conducted on February 26, 2018. The second part of this comment includes an excerpt regarding a methane exceedance as documented in the same inspection report. Please refer to the following **Response to Comments R-I32-2** through **R-I32-4**.

R-I32-2 The comment asks whether existing methane emissions from the inactive landfill were included the emissions associated with the Proposed Project.

First, regarding the noted methane exceedance, the LEA Closed Disposal Site Inspection Report dated May 31, 2018 confirms that the County has proactively worked with the LEA to identify the exact cause of the exceedance and to implement solutions that would remediate the problem. As of August 2018, the County is working to obtain LEA and FAA approval to install additional extraction wells to reduce the level of methane. It should also be clarified there are no above-ground emissions associated with this temporary exceedance. Rather, the elevated methane levels remain underground.

Second, please refer to **Master Response 6**, which clarifies that the PEIR was prepared to analyze potential environmental effects associated with the proposed activities identified in the Master Plan Update through 2036. CEQA Guidelines Section 15126.2 requires the assessment of a project (i.e., Master Plan Update) on the environment, including potential changes in the existing physical conditions. This does not require an agency to analyze impacts of existing conditions, nor is that within the scope of the project. Accordingly, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

R-I32-3 The comment further asks whether the RWQCB has been notified of ponding conditions over the inactive landfill and what are the potential impacts for groundwater contamination. As noted in the LEA Closed Disposal Site Inspection Report dated May 31, 2018, the area in which ponded water was previously observed had since become dry. Nonetheless, as a regulator of the inactive landfill, RWQCB conducts routine site inspections and reviews the monitoring reports required by the County.

As stated above, **Master Response 6** clarifies that the PEIR was prepared to analyze potential environmental effects associated with the proposed activities identified in the Master Plan Update through 2036. CEQA Guidelines Section 15126.2 requires the assessment of a project (i.e., Master Plan Update) on the environment, including potential changes in the existing physical conditions. This does not require an agency to analyze impacts of existing conditions, nor is that within the scope of the project. Accordingly, this comment does not provide input related to the recirculated Draft PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs). Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

R-I32-4 The comment asks when the asphalt cracks, as noted in the LEA Closed Disposal Site Inspection Report for an inspection conducted on February 26, 2018, were repaired and whether measurements for landfill gas was taken prior to repair. As noted in the LEA inspection report, the identified cracks were primarily related to water infiltration and not related to methane emissions. As this comment includes a request for information, it does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required.

R-I32-5 This comment includes an analysis of the lead monitoring station at the Airport and reporting by EPA and SDAPCD. The comment does not provide input related to the recirculated Draft PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs), and this topic was analyzed under the previously published Draft PEIR. This discussion was also included in the Draft PEIR Section 3.1.2.1 that was previously published. Nonetheless, additional clarification is noted below for the record.

The comment cites that in 2012, EPA commenced a leading emissions study at the Airport. The results initially showed lead concentrations above the NAAQS. However, after further review of the monitoring location by SDAPCD, it was determined USEPA's monitoring station was unsuitable to accurately document lead exposure levels at the Airport. Specifically, the single lead sampler was installed immediately adjacent to the primary run-up area, where aircraft engines are run at relatively high power settings to check engine components and propellers prior to take-off. This sampler location was in very close proximity to piston-driven aircraft engines running at relatively high power settings and sampled localized exhaust emissions, rather than ambient air to which the public could be exposed. SDAPCD expressed concerns to the EPA that this single-test location was inadequate to accurately document airborne lead levels on and around the airport. As a result, SDAPCD conducted additional monitoring at numerous locations where pilots, passengers, airport personnel, and the public have access. The results from SDAPCD were published in the October 2013 *Lead Gradient Study at McClellan-Palomar Airport*. Per EPA approval, the sampling location was changed (11/1/2014) to the most representative location for airborne lead monitoring and protection of the public health (along the perimeter fence in the northeast corner). A new AQS ID number, 06-073-1023, was assigned to the new location. The *Lead Gradient Study* concluded that the location with the highest average lead concentrations totaled 0.015 µg/m³, which is only 10% of the 0.15 µg/m³ federal standard.

The *Lead Gradient Study* showed that lead levels measured during the 1-year EPA-funded study are not representative of airborne lead concentrations in areas readily accessible to the public. However, because the airborne lead measurements collected during the 1-year EPA-funded study exceeded the minimum threshold, continuous airborne lead monitoring at McClellan-Palomar Airport was required.

According to lead emissions data from USEPA's air quality system, this relocated monitoring station most recently reported a 3-month rolling average of 0.02 micrograms per cubic meter as of January 2018. As noted in the APCD Annual Air Quality Monitoring Network Plan for 2017, all measured concentrations at the Airport location are well below 50% of the NAAQS. As of August 2018, the SDAPCD is petitioning to decommission regulatory lead sampling at the Airport. Please refer to Appendix B of the 2017 Network Plan for the EPA report.

R-I32-6 This comment includes citations to organizations and studies discussing lead emissions and its potential effects. Please refer to **Response to Comment R-I32-5**. Furthermore,

the topic raised in this comment (i.e., lead) was analyzed under the Draft PEIR that was previously circulated for public review. The comment does not provide input related to the recirculated Draft PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs). Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

R-132-7 This comment cites a previous underground detention basin project by the County Department of Public Works – Watershed Protection Program. The comment includes an excerpt from the project's dedicated website (<https://www.sandiegocounty.gov/content/sdc/dpw/flood/palomar.html>).

The comment further cites and includes an excerpt from the Fiscal Year 2012 Annual Report of the Carlsbad Watershed Urban Runoff Management Program prepared by the Carlsbad Watershed Copermittees. The excerpt cites the underground detention basin project and the County's regular monitoring of the facility to assess its effectiveness.

The comment then refers back to the County's website for the underground detention basin and includes an excerpt from the design page concerning the diversion structure that directs low flows.

The comment concludes by asking whether the County has considered the frequency and intensity of storms that may impact the underground detention basin's ability to collect and treat storm flows as a result of climate change. Although this comment references climate change, the intent is to gather information pertaining to an existing built facility and how global climate change might affect the facility. Accordingly, this comment does not contain remarks or substantive issues related to the Master Plan Update or the PEIR, including the recirculated sections. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

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